

FILED

AUG 04 2020 *EW*

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

SASAN ESKAFYAN,
also known as "Alex," and
MARIO HURTADO-MEZA

No.

20CR 458

Violations: Title 18, United States Code,
Sections 1956(a)(2)(B)(i) and (h); Title
21, United States Code, Section 846

JUDGE NORGLÉ

UNDER SEAL

Magistrate Judge McShain

COUNT ONE

The SPECIAL NOVEMBER 2019 GRAND JURY charges:

Beginning on or about March 7, 2019, and continuing until on or about July 4, 2019, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

SASAN ESKAFYAN, also known as "Alex," and
MARIO HURTADO-MEZA,

defendants herein, did conspire with each other, with Individual A, and with others known and unknown to the Grand Jury, to knowingly and intentionally possess with intent to distribute and distribute a controlled substance, namely, five kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, and a quantity of a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-1 [1-(2-phenylethyl)-4-piperidinyl] propanamide), a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1);

In violation of Title 21, United States Code, Section 846.

COUNT TWO

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

Beginning on or about March 15, 2019, and continuing until on or about July 4, 2019, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

SASAN ESKAFYAN, also known as "Alex," and
MARIO HURTADO-MEZA,

defendants herein, did conspire with each other, with Individual A, and with others known and unknown to the Grand Jury, to commit an offense in violation of Title 18, United States Code, Section 1956, namely, to transport and attempt to transport monetary instruments and funds, that is, approximately \$529,295 in U.S. Currency, from a place in the United States, that is, Chicago, Illinois, to a place outside the United States, that is, Mexico, knowing that the monetary instruments and funds involved in the transportation represented the proceeds of some form of unlawful activity and knowing that such transportation was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, that is, the felonious buying and selling and otherwise dealing in a controlled substance, in violation of Title 18, United States Code, Section 1956(a)(2)(B)(i);

In violation of Title 18, United States Code, Section 1956(h).

COUNT THREE

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

On or about April 3, 2019, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

SASAN ESKAFYAN, also known as "Alex," and
MARIO HURTADO-MEZA,

defendants herein, did attempt to transport monetary instruments and funds, that is, approximately \$529,295 in U.S. Currency, from a place in the United States, that is, Chicago, Illinois, to a place outside the United States, that is, Mexico, knowing that the monetary instruments and funds involved in the transportation represented the proceeds of some form of unlawful activity and knowing that such transportation was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, that is, the felonious buying and selling and otherwise dealing in a controlled substance;

In violation of Title 18, United States Code, Sections 1956(a)(2)(B)(i) and 2.

FORFEITURE ALLEGATION

The SPECIAL NOVEMBER 2019 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 21, United States Code, Section 846, as set forth in this Indictment, defendants SASAN ESKAFYAN and MARIO HURTADO-MEZA shall forfeit to the United States of America any property which constitutes and is derived from proceeds obtained, directly and indirectly, as a result of the offense; and any property used, and intended to be used, in any manner and part, to commit and facilitate commission of the offense, as provided in Title 21, United States Code, Section 853(a).

2. Upon conviction of an offense in violation of Title 18, United States Code, Section 1956, as set forth in this Indictment, defendants SASAN ESKAFYAN and MARIO HURTADO-MEZA shall forfeit to the United States of America any property involved in such offense, and any property traceable to such property, as provided in Title 18, United States Code, Section 982(a)(1).

3. The property to be forfeited includes, but is not limited to, the following specific property:

i. approximately \$529,295 in U.S. Currency seized by law enforcement from the area of the 2800 block of W. Diversey Avenue in Chicago, Illinois, or about April 3, 2019; and

ii. approximately \$10,000 in U.S. Currency seized by law enforcement from the area of the 2900 block of S. Cicero Avenue in Chicago, Illinois, on or about April 24, 2019.

4. If any of the property described above, as a result of any act or omission

by a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, as provided in Title 21, United States Code, Section 853(p).

A TRUE BILL:

FOREPERSON

Signed by Erika Csicsila on behalf of the
UNITED STATES ATTORNEY